

**Luster, Tom**

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**From:** Luster, Tom  
**Sent:** Friday, October 06, 2000 8:43 AM  
**To:** Hellwig, Raymond  
**Subject:** FW: Lessons Learned from Big Projects - the official version

**Importance:** High

-----Original Message-----

**From:** McMillan, Andy  
**Sent:** Monday, June 12, 2000 11:25 AM  
**To:** ECY DL CRO SEA; ECY DL ERO SEA; ECY DL HQ SEA; ECY DL NWRO SEA; ECY DL PADILLA BAY ALL; ECY DL SWRO SEA  
**Subject:** Lessons Learned from Big Projects - the official version  
**Importance:** High

I sent the wrong version of the document with the first email message so please delete it and use this one.

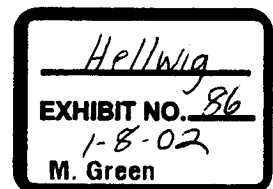
Finally! I have compiled all of the input from SEA program staff on the lessons we have learned from our involvement in big, complex projects. I am attaching a Word document that outlines 7 recommendations for our program to consider. I will be discussing these recommendations with PMT at their next meeting on Tues, June 20 and asking for a decision on next steps. If you have any input to add to this discussion, please contact me or your section supervisor. Thanks for you patience - sorry this took so long.



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## ***Lessons Learned from "Big" Projects***

### **Recommendations for SEA Program**

SEA program staff developed the following recommendations based on two half-day meetings and numerous smaller discussions and email exchanges. This was prompted by our collective experiences with large, complex projects (e.g. Crown Jewel Gold Mine; Sea-Tac Third Runway; 304th Street Landfill; Arrowleaf) over the past several years and our desire to improve on the way these projects were handled.

#### **Recommendations**

##### **1. More attention should be paid to workload management**

Large projects require a lot of technical analysis and often have significant policy implications. Project staff can end up spending most of their time on a single project and find themselves unable to keep up with other workload priorities. It is often very difficult to predict the amount of time that a large project will require. However, staff and their supervisor should try to develop a reasonable estimate of the time required on a large project early on, and identify what other work can be shifted to other staff or what should "fall off the platter". Once decisions are made, management should support staff by deflecting requests for staff time that is already committed to large projects. On many projects we will need to hire consultants or additional staff to help with project review or "backfill" behind a staff person and the new cost recovery program will be an important tool for accomplishing this.

##### **2. Managers should not reward project applicants' attempts to get "early assurances" or do an "end-around" project staff.**

Many project applicants will try to get Ecology managers to assure them that a project is "permissible" or will go to managers to get "relief" when project staff are making requests or demands that applicants find unreasonable. There are several ways that Ecology management can support staff and prevent applicant "end-arounds". These include:

- Management should not make any commitments or give assurances to project applicants regarding permit approval timelines or decisions without buy-in from the appropriate project staff.
- When senior managers meet with project applicants they should include lead project staff or lower level managers in the meetings. All managers need to keep project staff informed of meetings that have occurred with applicants and what was communicated – "heads-ups" work both ways.
- Managers need to talk to staff before they respond to complaints (especially personal attacks) and give staff the benefit of the doubt. Most attempts by applicants to circumvent staff are really attempts to circumvent requirements for additional information or mitigation.

##### **3. We need to have a broad discussion and possibly develop guidance on project decision-making and how to deal with situations when staff do not support agency decisions on projects.**

Occasionally, managers make decisions on large projects (and small ones too) that project staff do not support. We need to have a broader discussion on how to handle these situations. Sometimes staff sublimate their views to an agency decision and sometimes they decide not to support an agency decision. What implications does this have for staff involvement in legal appeals of agency decisions? How do we handle situations where staff disagree over interpretations of technical information or legal perspectives?

In the past, staff disagreements have resulted in them being branded as "not a team player" or as a potentially "hostile" witness. How can we avoid this?

**4. We need to make sure that broad public input occurs throughout our review of large projects.**

One common element of large projects is public interest and concern. Frequently, we work closely with project applicants and local governments on these projects and only include the broader public at one or two points in the process. Often, public input comes after many project decisions are made and applicants often believe that decisions are fixed prior to public input. This has led to the perception that issues are being raised "too late" in the process to be addressed. However, if public input is "late", then "late" issues will arise and we should be prepared to address them.

We should always be cognizant that we represent the public as well as applicants and local governments. We should always take formal public involvement processes seriously and make it clear to applicants that no decisions are final until we receive public input. We should also consider additional steps beyond the normal SEPA and permit processes to involve interested members of the public as we review large projects.

**5. Project staff need to provide clear documentation to support positions or decisions and obtain peer review when possible.**

Most of the large projects we work on are technically complex and likely to be appealed. We are often in the position of disagreeing with technical experts hired by the applicant or experts representing a public interest group. Project technical staff should provide scientific documentation to support recommendations on project decisions and seek peer review where feasible. However, we need to recognize that this level of documentation requires time and resources to develop and produce.

**6. The agency should develop a better, more consistent and comprehensive process for coordinating and managing large projects.**

Many of these projects have suffered from a lack of a well-coordinated agency review process. While different approaches have been used on a number of these projects, each of them has suffered from problems with coordination, communication and commitment.

A cross-program team should be convened to develop a coordinated process. The Permit Assistance Center may be the appropriate group to take the lead on this task. Ideally, a coordinated process would contain the elements described below in Appendix A.

**7. The SEA Program should develop a process for coordinating staff involvement in large projects that include more than one part of the program.**

It may take some time for the agency to develop a project coordination process and the SEA Program could benefit from establishing one for our own coordination on large projects. Either the PAC or the SEPA section would be the best groups to develop a program coordination process. This process should include most of the elements described in Appendix A.

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## ***APPENDIX A - Proposed process for coordinating large projects***

### ***1) Identify a Project Lead***

The agency needs to have one person who is responsible for coordinating all aspects of the project. This person should be either a Permit Assistance Center staff or someone with project coordination experience. They should be selected by the Ecology Management Team or similar management-level team.

### ***2) Identify Management Lead***

There should be one ecology manager (regional director or regional section head) who works closely with the Project Lead and is the primary spokesperson for the agency.

### ***3) Initial Scoping Meeting***

An initial scoping meeting should be convened by the project and management leads to identify the following:

- Key issues including any potential “project stoppers”.
- Permits and approvals needed (from any agency) and the programs that need to be involved.
- Staff who will need to be involved in the project and a realistic estimate of the expected amount of time they will need to spend on the project.
- Additional technical expertise needed that may require new staff or consultants.
- Data needs – special studies, especially those requiring a lot of data collection.
- Public process: how and when the public, other agencies, and the tribes should be involved.
- Public information needs, incl. PIO staff.
- Projected timeline for project review and permitting decisions.
- Decision-making: who makes decisions and when are they made.
- Documentation: how and when to document key decisions.

It is recognized that we will not be able to predict precisely many of these items in an initial scoping meeting, and that many of them will need to be fleshed out as more information is obtained. It is also recognized that new issues will often arise as project review proceeds and any timeline developed at the beginning of a project will need to be revised in light of new information.

### ***4) Develop a Scoping Document***

The project lead should develop a scoping document that outlines the information generated from the initial and subsequent scoping meetings.

### ***5) Develop a Memorandum of Agreement (as appropriate)***

A Memorandum of Agreement should be developed and signed by all staff and their managers regarding their commitment to the project. The Memorandum should specify:

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- Staff roles, responsibilities and time commitment.
- Other resources available to assist with project review and decision-making.

These MOAs need to be revisited periodically and revised as needed.

#### **6) Agency Summary of Findings and Conclusions**

Agency staff who are involved with the project would meet after the SEPA environmental analysis is completed and prepare a document describing the alternative(s) and mitigation measures that the agency will be considering during permit review. These conclusions would be based on the information in the SEPA document (final EIS or Determination of Nonsignificance) and any other information that has been generated for permits. The Summary of Findings and Conclusions would acknowledge that additional information might be generated during the permit process that could affect the conclusions. It would also involve disseminating the Summary to Ecology staff with a permit to issue on the project and to other agencies with jurisdiction on the project. If, during permitting, a decision was going to conflict with the Summary of Findings and Conclusions, the permit writer would need to inform all other permitting entities

The Summary would necessitate a discussion by all involved programs and would facilitate the involved programs to understand the different programs' limitations, concerns, and preferences. It would facilitate consideration of alternatives, provide an agency look at the total proposal, and would minimize permitting conflicts between programs and with other agencies..

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